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SYMETTRICA ENTERTAINMENT, LTD.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SYMETTRICA ENTERTAINMENT, LTD., a United Kingdom limited company,) Case No.: 2:19-cv-01192-CJC (KSx)
)
) DISCOVERY MATTER
)
Plaintiff,) The Honorable Karen L. Stevenson
) Courtroom 580
v.)
) PLAINTIFF'S NOTICE OF LODGING
UMG RECORDINGS, INC., a Delaware corporation,) EXHIBITS "I", "M" AND "P" IN SUPPORT
) OF PLAINTIFF'S MOTION TO COMPEL
) DEFENDANT'S FURTHER WRITTEN
Defendants.) RESPONSES AND DOCUMENTS TO
) PLAINTIFF'S REQUEST FOR
) PRODUCTION OF DOCUMENTS
) (SET ONE) AND TO COMPEL
) DEFENDANT'S PRODUCTION OF
) CERTAIN UNREDACTED DOCUMENTS
)
AND RELATED COUNTERCLAIMS AND THIRD-PARTY CLAIMS) Hearing Date: July 1, 2020
) Hearing Time: 10:00 a.m.
) Location: Courtroom 580
)
) COMPLAINT FILED: February 15, 2019
) DISCOVERY CUTOFF: July 9, 2020
) PRE-TRIAL CONFERENCE: October 19, 2020
) TRIAL DATE: October 27, 2020

1 Plaintiff SYMETTRICA ENTERTAINMENT, LTD. (“**Plaintiff**” or
2 “**Symettrica**”) hereby lodges the following exhibits in support of its motion to compel
3 Defendant UMG RECORDINGS, INC.’S (“**Defendant**” or “**UMG**”) responses and
4 documents to Plaintiff’s request for production of documents (set one) and to compel
5 Defendant UMG’s production of certain unredacted documents (“**Plaintiff’s Motion to**
6 **Compel**”). [DE 56].

7 Plaintiff respectfully submits this Notice of Lodging following a meet and confer
8 conference of counsel conducted pursuant to L.R. 79-5.2.2(b) in connection with
9 Plaintiff’s inclusion of certain documents within Plaintiff’s Motion to Compel
10 designated by UMG as “Confidential” pursuant to this Court’s Stipulated Protective
11 Order. [DE 39]. Specifically, the parties’ L.R. 79-5.2.2(b) conference of counsel,
12 intended to eliminate the need for filing under seal by means of redaction, pertained to
13 Plaintiff’s filing of **Exhibits “I”, “M” and “P”** to the declaration of Michael A. Trauben
14 filed in support of Plaintiff’s Motion to Compel. [DE 56-1].

15 Following the L.R. 79-5.2.2(b) conference of counsel, Defendant UMG agreed to
16 allow for the public filing of the entirety of **Exhibits “I”, “M” and “P”** to the
17 declaration of Michael A. Trauben filed in support of Plaintiff’s Motion to Compel,
18 subject to Plaintiff’s redaction of certain email addresses and cell phone numbers
19 displayed on the subject Exhibits.

20 With respect to **Exhibit “I”** to the declaration of Michael A. Trauben, excluding
21 the redactions of certain email addresses and cell phone numbers in accordance with the
22 parties’ meet and confer conference pursuant to L.R. 79-5.2.2(b), the remainder of the
23 redactions reflected on this **Exhibit “I”** are preexisting redactions UMG made prior to
24 producing the documents embodied within the **Exhibit “I”**. UMG made these
25 preexisting redactions prior to producing the documents embodied within **Exhibit “I”**
26 based upon the assertion of the attorney-client privilege and/or work product privilege.
27 [DE 56-11].
28

It is UMG’s preexisting redactions in **Exhibit “I”** that are, in part, the subject-matter of Plaintiff’s pending Motion to Compel, wherein Plaintiff seeks an Order compelling Defendant UMG to produce the unredacted versions of certain redacted documents Defendant UMG produced, bearing the following bates numbers: UMG000036, UMG000038, UMG000039, UMG000040, UMG000042, UMG000046, UMG000049, UMG000054, UMG000058, UMG000062, UMG000066, UMG000072 and UMG000092. [DE 56].

Consistent with the L.R. 79-5.2.2(b) conference of counsel, Plaintiff hereby lodges the following partially-redacted Exhibits filed in support of Plaintiff’s Motion to Compel:

Exhibit	Description
“I” [DE 56-10]	UMG’s Redacted Takedown Related Communications (with bates-numbers ranging between UMG 000036 and UMG 000094) [DE 56-1 at ¶13]
“M” [DE 56-14]	Exhibit “46” to the deposition of David Benjamin, Esq, consisting of an email from David Benjamin to Adeline B. Ferretti and Daniel Getz, dated January 17, 2019 at 6:10 p.m. Eastern Time, indicating that “take downs are in process”, produced by Defendant UMG and bates numbered UMG000032 [DE 56-1 at ¶17]
“P” [DE 56-17]	Exhibit “39” to the deposition of Nicholas Tardif, Esq., consisting of multiple emails dated January 17, 2019, produced by Defendant UMG and bates numbered UMG000085 – UMG000086 [DE 56-1 at ¶20]

Accordingly, Plaintiff respectfully requests that prior Docket Entries DE 56-10, DE 56-14 and DE 56-17 be deemed replaced with **Exhibits “I”, “M” and “P”**, respectively, as lodged concurrently herewith.

1 **DATED:** June 10, 2020

Respectfully submitted,

2 **SINGH, SINGH & TRAUBEN, LLP**
3 **THOMAS K. RICHARDS**

4 By: /s/ Thomas K. Richards
5 Thomas K. Richards

6 *Attorneys for Plaintiff/Counter-Defendant*
7 SYMETTRICA ENTERTAINMENT, LTD.
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